

**REMARKS**

Claims 1, 2, 4, 7 and 11-17 are pending. By this Amendment, claims 1, 4, 7, 12-14 and 17 are amended, and claims 3, 5, 6 and 8-10 are canceled. No new matter is added by the above amendments.

These amendments should be entered after final rejection at least because (1) the amendments do not raise any new issues or the issue of new matter because they either rewrite objected-to claims in independent form (claim 1) or clarify the claims with respect to features previously recited and argued (claims 7, 12-14 and 17); (2) they place the application in condition for allowance or at least better condition for appeal; and (3) they do not add any new claims.

Applicant notes with appreciation the allowance of claim 11. Applicant also notes with appreciation the identification of allowable subject matter in claim 6. The features of claim 6 and intermediate claims 3 and 5 have been placed into claim 1. Accordingly, claim 1 and its dependent claims 2 and 4 are in condition for allowance.

In addition, the features of previous claim 1 have been placed into claim 7 such that claim 7 is an independent claim. Claims 7, 14 and 17 also have been amended to clarify the linking data stored in the second database, and the manner in which the linking data in the second database is used.

The Examiner is again requested to acknowledge receipt of Applicant's Claim for Priority and the certified copy of the priority document, which were submitted to the Patent Office on May 29, 2001.

Claims 1-4, 7-10, 12 and 14-17 stand rejected under 35 U.S.C. §102(b) over "Windows 98 Professional Reference" (hereafter WPR). This rejection is moot with respect to claims 1-4 and 8-10. This rejection is respectfully traversed with respect to claims 7, 12 and 14-17.

Regarding claims 7 and 14-17, Applicant respectfully submits that WPR does not disclose or suggest "recording in a second database data linking a previous storage location of the image data to a current storage location of the digital image data when the storage location of the digital image data in the first database is changed" and "consulting a second database for determining the current location of the digital data in the first database when the digital image data is not located in the designated location that was designated in the designating [or third] step." These features are not expressly disclosed in WPR and they are not inherent in WPR.

Although the original Office Action refers to two FATs, WPR merely discloses that two identical copies of FAT are stored in case one is damaged, and when one of the FATs is damaged, the same content as that of the damaged FAT is copied to the other one. This does not correspond to the features from independent claims 7, 14 and 17 quoted above, and it does not suggest those features. Accordingly, independent claims 7, 14 and 17, as well as dependent claims 15 and 16, are patentable over WPR.

With respect to independent claim 12, WPR does not disclose or suggest the claimed "second output for transmitting to the external device an encrypted information indicative of a location added to a print for requesting decryption of the encrypted information," as previously argued. The May 18 Office Action states, without any factual support, that "the newly recited features of the claims are inherent in the art." These features are not disclosed or inherent in WPR. While encryption and decryption certainly are known, claim 12 is directed to more than merely encrypting and decrypting. In order to even further distinguish over WPR, claim 12 has been amended to recite "a receiver for receiving decrypted information from the external device based on the request for decryption that was transmitted to the external device." This feature also is not disclosed or inherent in WPR. In summary,

the combination of features recited in claim 12 are not disclosed, inherent, or suggested by WPR. Thus, claim 12 is patentable over WPR.

Withdrawal of the rejection under 35 U.S.C. §102(b) is requested.

Claims 5 and 13 stand rejected under 35 U.S.C. §103(a) over WPR in view of U.S. 2002/0165911 to Gabber et al. This rejection is moot with respect to claim 5 and is respectfully traversed with respect to claim 13.

The combination of WPR and Gabber et al. does not disclose or suggest the features recited in claim 13, including a first output that transmits an order to an external device, the order including digital image data and information indicative of a location of the digital image data, an encrypting unit that encrypts the information indicative of the location of the digital image data in the storage, and a second output for transmitting to the external device the encrypted information indicative of the location of the digital image data in the storage. As noted in Applicant's previous response, while Gabber et al. may encrypt a URL, this encrypted information is used for internal file management, and is not disclosed or suggested as being transmitted outside of the computer. The final rejection does not respond to Applicant's previous argument on this point.

Withdrawal of the rejection under 35 U.S.C. §103(a) is requested.

In view of the foregoing, Applicant respectfully submits that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe anything further would be desirable to place this application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned attorney at the telephone number listed below.

Respectfully submitted,



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